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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

In the Matter of:

Venice, CA Post Office

Venice, CA

(Venice Stakeholders Association and Mark

Ryavec, Petitioners)

Docket No. A2012-17

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO FILE THE ADMINISTRATIVE RECORD

(November 28, 2011)

The United States Postal Service (the "Postal Service") hereby respectfully requests an extension of time to respond to PRC Order No. 967.

Pursuant to the adjusted procedural schedule set forth in Order No. 967, the Postal Service was to respond to Order No. 967 no later than November 28, 2011, 7 days before Petitioners' initial brief is to be filed. However, because this is a relocation and not a discontinuance of service, there was no collection of documents, determined by the Postal Service to constitute the Administrative Record. The Postal Service was required to identify materials relevant to the relocation decision, and compile these materials from various sources within the Postal Service. As such, the Postal Service respectfully requests an extension until December 2, 2011 to obtain all relevant documents necessary to respond to PRC Order No. 967. Julie Kimball, Esq., counsel for Petitioners stated that she had no objection to an extension of the Postal Service's deadline, to the extent that the PRC will adjust the procedural schedule to allow Petitioners to file their initial brief on December 9, 2011, a week after the Postal Service responds to PRC Order No. 967.

For the foregoing reasons, the Postal Service requests an extension until December 2, 2011 to respond to PRC Order No. 967.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

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